

June 19, 2019

Via e-mail

Greg Frischmann Senior Counsel Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, DC 20551

Re:

Request for Extension of Comment Period Control and Divestiture Proceedings Docket No. R-1662; RIN 7100-AF 49

The Structured Finance Association (SFA)¹ respectfully requests that the Board of Governors of the Federal Reserve System (Board) extend the public comment period for the rulemaking proceedings noted above.

On May 14, 2019, the Board published notice in the Federal Register of a proposal to revise the Board's regulations related to determinations of whether a company has the ability to exercise a controlling influence over another company for purposes of the Bank Holding Company Act or the Home Owners' Loan Act. The proposal would significantly expand the number of presumptions for use in such determinations, and our membership is carefully working through potential implications for the securitization market.

SFA hereby requests that the Board extend the public comment period until no earlier than August 12, 2019. Thank you for considering this request and we appreciate the opportunity to comment.

Sincerely,

Sairah Burki

Managing Director, Head of Policy

¹ SFA is a member-based, trade industry advocacy group focused on improving and strengthening the broader structured finance and securitization market. SFA provides an inclusive network for securitization professionals to collaborate and, as industry leaders, drive necessary changes, be advocates for the securitization community, share best practices and innovative ideas, and educate industry members through conferences and other programs. Members of SFA represent all sectors of the securitization market including issuers, investors, financial intermediaries, law firms, accounting firms, technology firms, rating agencies, servicers, and trustees.